

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

Bay State Gas Company

D.T.E. 05-27

**ATTORNEY GENERAL'S EIGHTEENTH SET OF
DOCUMENT AND INFORMATION REQUESTS**

The following are the Attorney General's EIGHTEENTH SET of discovery and information requests.

- AG-18-1 Please provide a complete and detailed description of the Gas Technology Institute's Operations Technology Development ("OTD") program. Include when the program began, the OTD's total annual budget since the program began, all of the OTD program participants and the annual fees and any other contributions they pay to be participants, a complete list of all the projects OTD is currently undertaking and how much each project has cost to date or is estimated to cost.
- AG-18-2 Please provide a complete and detailed description of the Gas Technology Institute's Environmental Issues Consortium ("EIC") program. Include when the program began, the EIC's total annual budget since the program began, all of EIC's program participants and the annual fees and other contributions they pay to be participants, a complete list of all the projects EIC is currently undertaking and how much each project has cost to date or is estimated to cost.
- AG-18-3 Please refer to Exhibit BSG/DGC-1, page 59. For each of the four OTD projects, please provide the following information:
- (1) a complete and detailed description of the nature and purpose of the project along with the expected outcome;
 - (2) the total originally estimated cost of the project;
 - (3) the total cost of the project to date;
 - (4) the current estimated cost of the project;
 - (5) expected patents and patent revenues, copyrights and royalties; and

(6) the current annual cost of the project.

- AG-18-4 Please provide NiSource's total contribution to GTI, the OTD and EIC programs, along with the amounts assigned / allocated to each of its subsidiaries.
- AG-18-5 Please itemize and quantify GTI's Royalties and Patent Rights Revenues paid to NiSource.
- AG-18-6 Please provide a complete and detailed description of the fee paying members rights and privileges to GTI's Royalties and Patent Rights.
- AG-18-7 Please provide the workpapers, calculations, formulas, assumptions and other supporting documentation used to determine the fees to be paid by NiSource and that proportion to be paid by Bay State Gas Company for each of the four OTD projects and any EIC projects.
- AG-18-8 Please provide copies of all materials, reports, workpapers, internal and external communications, documents filed with the Department, and responses to any an all information requests regarding Service Quality during the test year and 2005.
- AG-18-9 Please describe any and all efforts the Company has undertaken to educate the public about reporting gas leaks. Please provide copies of any and all documents, including but not limited to, mailings and bill stuffers, the Company uses to communicate with the public.
- AG-18-10 For the years 2003, 2004 and 2005, please provide a list of all the phone numbers made available by the Company, and NiSource, to customers and prospective customers of any type in the Company's service territory. For each phone number, explain all of the options available and whether a live representative or an automated voice service initially answers the call.

DATED: June 14, 2005.